

1 Joshua Koltun (Bar No. 173040)
2 One Sansome Street
3 Suite 3500, No. 500
4 San Francisco, California 94104
5 Telephone: 415.680.3410
6 Facsimile: 866.462.5959
7 joshua@koltunattorney.com

8
9 Attorney for Third Party Witnesses
10 Below the Blue,
11 Marine Taxonomic Services, Ltd,
12 Seth Jones, and Monique Rydel-Fortner

13 UNITED STATES DISTRICT COURT

14 EASTERN DISTRICT OF CALIFORNIA

15 CALIFORNIA SPORTFISHING
16 PROTECTION ALLIANCE,

17 Plaintiff,
18 v.
19 PACIFIC BELL TELEPHONE COMPANY
20Defendant

21 Case 2:21-cv-00073

22 **DECLARATION OF**
23 **VISHAL OZA**

Joshua Koltun ATTORNEY

1 I, Vishal Oza, declare as follows:

2 1. I am a Senior Director of Forensic Technology Services at Alvarez & Marsal Disputes
3 and Investigations, LLC. I am overseeing the forensic data collection and eDiscovery services being
4 provided to BTB/MTS in this discovery matter.

5 2. The parties have agreed to a technical protocol (Exhibit C), which is a typical
6 specification for the production of ESI. To illustrate how this specification works, take for example,
7 an email in its native .eml or .msg format. That email, in its native format, cannot be bates-stamped
8 on each page; instead, one can rename the individual email file name with a single bates number. The
9 way that email processing will be handled following Exhibit C instructions is as follows. The native
10 email(s) will be processed and loaded into an eDiscovery platform such as Relativity. A TIFF file of
11 the email(s) is created at page level. A TIFF file is an image, similar to a PDF file where each page of
12 that TIFF file can be bates-stamped and redacted as necessary. The text of the email is extracted and a
13 separate “text file” is created and loaded in Relativity for keyword searching, and the metadata is
14 extracted and stored in a database such as SQL. A separate “load file” is created for documents that
15 are located by keyword searches for production using Relativity platform. The load file will provide
16 the association between the individual text files, TIFF images, document/email metadata and any
17 native files.

18
19 I declare under penalty of perjury under the laws of the United States and California that the foregoing
20 is true and correct.

21
22 Executed on January 11, 2023 at Costa Mesa, California.

23
24
25
26
27
28



Vishal Oza